

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Case 1:23-cv-05875-JGK
Case 1:23-cv-06881-JGK

-----X
D. G. SWEIGERT

Plaintiff,
-against-

JASON GOODMAN
Defendant.
-----X

**NOTICE OF MOTION
FOR SANCTIONS
PURSUANT TO FRCP
RULE 11**

PLEASE TAKE NOTICE that, Defendant JASON GOODMAN, (“Goodman”) by and for himself pro se, served Plaintiff DAVID GEORGE SWEIGERT, (“Sweigert”) with a safe harbor notification pursuant to FRCP Rule 11(c)(2) on October 16, 2023. Plaintiff’s challenged claims have not been withdrawn or appropriately corrected within 21 days and so, with this filing and its associated briefs, memoranda and exhibits, and pursuant to FRCP Rule 11(c)(1), now Goodman respectfully moves this Court for an order granting sanctions against Plaintiff Sweigert, including sua sponte dismissal with prejudice and a declaration that Sweigert is a vexatious litigant, enjoining him from further action against Goodman and any other appropriate relief as determined by the Court, for the reasons set forth in the attached.

Dated: New York, New York November 7, 2023

Respectfully submitted,



Jason Goodman
Pro Se Defendant
truth@crowdsourcethetruth.org
252 7th Avenue Apt 6s
New York, NY 10001
347-380-6998

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**CERTIFICATE OF
SERVICE**

It is hereby certified that Defendant Pro Se, Jason Goodman, served Plaintiff and Defendant X Corp with a copy of the NOTICE OF MOTION FOR RULE 11 SANCTIONS via USPS.

D. G. SWEIGERT, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719.

Kenneth M. Trujillo-Jamison
Willenken LLP
707 Wilshire Blvd., Suite 3850
Los Angeles, CA 90017

Dated: New York, New York November 7, 2023

Respectfully submitted,



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